

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION**

FAIR FIGHT, INC., JOHN DOE, and
JANE DOE,

Plaintiffs,

v.

TRUE THE VOTE, CATHERINE
ENGELBRECHT, DEREK
SOMERVILLE, MARK DAVIS, MARK
WILLIAMS, RON JOHNSON, JAMES
COOPER, and JOHN DOES 1-10,

Defendants.

Case No. _____

**MOTION TO
PROCEED
ANONYMOUSLY**

Plaintiffs Fair Fight Inc., John Doe, and Jane Doe, by and through the undersigned attorneys, file this Motion to Proceed Anonymously. Plaintiffs John and Jane Doe (“Does”) seek to proceed anonymously given the real threats of voter intimidation as detailed in the Complaint (ECF No. 1). Further, the Does fear retaliation from Defendants and their supporters for having filed the lawsuit. For the reasons stated in the accompanying Memorandum of Law, Plaintiffs request leave of this Court to proceed anonymously.

Dated this, the 23rd day of December, 2020.

Respectfully Submitted,

Marc E. Elias*
Uzoma Nkwonta*
Christina A. Ford*
PERKINS COIE LLP
700 Thirteenth St., N.W., Suite 800
Washington, D.C. 20005-3960
Telephone: (202) 654-6200
Facsimile: (202) 654-9959
melias@perkinscoie.com
unkwonta@perkinscoie.com
christinaford@perkinscoie.com

Thomas J. Tobin*
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Phone: (206) 359-8000
Fax: (206) 359-9000
ttobin@perkinscoie.com

Molly E. Mitchell*
PERKINS COIE LLP
1111 West Jefferson Street, Suite 500
Boise, ID 83702-5391
Phone: (208) 343-3434
Fax: (208) 343-3232
mmitchell@perkinscoie.com

Counsel for Plaintiffs

**Pro hac vice motion forthcoming*

/s/ Allegra J. Lawrence
Allegra J. Lawrence (GA Bar No. 439797)
Leslie J. Bryan (GA Bar No. 091175)
Maia Cogen (GA Bar No. 832438)
LAWRENCE & BUNDY LLC
1180 West Peachtree Street, Suite 1650
Atlanta, GA 30309
Telephone: (404) 400-3350
Fax: (404) 609-2504
allegra.lawrence-
hardy@lawrencebundy.com
leslie.bryan@lawrencebundy.com
maia.cogen@lawrencebundy.com

Dara Lindenbaum (GA Bar No. 980780)
**SANDLER REIFF LAMB
ROSENSTEIN & BIRKENSTOCK,
P.C.**
1090 Vermont Avenue, NW, Suite 750
Washington, DC 20005
Telephone: (202) 479-1111
Fax: 202-479-1115
lindenbaum@sandlerreiff.com

CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2020, I caused the foregoing MOTION TO PROCEED ANONYMOUSLY and the accompanying BRIEF IN SUPPORT and PROPOSED ORDER to be served on Defendants Catherine Englebrecht and True the Vote by placing a copy in Federal Express addressed as follows:

True the Vote
c/o Catherine E. Englebrecht
7232 Wynnwood Lane
Houston, TX 77008-6041

Catherine E. Englebrecht
7232 Wynnwood Lane
Houston, TX 77008-6041

I further certify that, on December 24, 2020, I served the remaining Defendants via hand-delivery addressed as follows:

Derek Sommerville
5130 Saddlebred Lane
Cumming, GA 30028

James Cooper
694 Loth Wages Road
Dacula, GA 30019

Mark Davis
325 Westfork Way
Suwanee, GA 30024

Mark Williams
3312 Canary Trail
Duluth, GA 30096

Ron Johnson
1754 Tugalo Drive
Jefferson, GA 30549

/s/ Allegra J. Lawrence
Allegra J. Lawrence